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15 UNITED STATES DISTRICT COURT
16
17 FOR THE NORTHERN DISTRICT OF CALIFORNIA
18
19 OAKLAND DIVISION

20 EPIC GAMES, INC.,

21 Plaintiff, Counter-
22 defendant

23 v.

24 APPLE INC.,

25 Defendant,
26 Counterclaimant.

27 Case No. 4:20-cv-05640-YGR-TSH

28 **DEFENDANT APPLE INC.'S
ADMINISTRATIVE MOTION TO SEAL
EXHIBITS PX-1017 AND PX-2946**

1 Pursuant to Federal Rule of Civil Procedure 26(c), Defendant Apple Inc. (“Apple”) moves the
 2 Court to partially seal Exhibits PX-1017 and PX-2946. These exhibits should be partially sealed
 3 because they reflect non-public Apple financial and business information that the Court has already
 4 ordered sealed in Trial Order No. 4 RE: (1) Administrative Motions to Seal; and (2) Partial Ruling on
 5 Expert Objections. *See* Dkt. 614.

6 Specifically, PX-1017 reflects the same non-public Apple financial data that the Court has
 7 ordered sealed at Figure 25 of the Written Direct Rebuttal Testimony of Michael I. Cragg, Ph.D. *See*
 8 *id.* at 6 (order sealing Cragg Rebuttal Figure 25 because it “contains Apple’s confidential financial
 9 information”); *see also* Dkt. 509-11 at 46 (unredacted Cragg Figure 25 containing same, now-sealed
 10 non-public Apple confidential financial information reflected in Exhibit PX-1017). Likewise, PX-
 11 2946 reflects the same non-public Apple financial data and business information that the Court has
 12 ordered sealed at Figure 4 of the Written Direct Rebuttal Testimony of Michael I. Cragg, Ph.D. *See*
 13 Dkt. 614 at 5 (order sealing Cragg Rebuttal Figure 4 because it “contains Apple’s confidential
 14 business information”); *see also* Dkt. 509-11 at 17 (unredacted Cragg Figure 4 containing same, now-
 15 sealed non-public Apple confidential business information reflected in Exhibit PX-2946).

16 Disclosure of Apple’s (already-sealed) confidential financial and business information
 17 contained in Exhibits PX-1017 and PX-2946 would put Apple at a competitive disadvantage, as
 18 stated in the concurrently-filed Declaration of Rachel S. Brass.

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 20 Dated: May 24, 2021

Respectfully submitted,

21
 22 GIBSON, DUNN & CRUTCHER LLP

23 By: /s/ Rachel S. Brass
 24 Rachel S. Brass

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 26 Attorney for Defendant Apple Inc.